

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

VIRTUAL STUDIOS, INC.)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 1:12-cv-00015
)	
JOY CARPETS & CO. INC.)	
f/k/a JOY CARPETS, INC.)	
)	
Defendant.)	

**DEFENDANT JOY CARPETS & CO., INC.'S MOTIONS TO DISMISS
FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE**

Defendant, Joy Carpets & Co., Inc. ("Joy Carpets"), respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 12(b)(2) to dismiss Joy Carpets on the grounds that Joy Carpets does not have contacts with this forum sufficient to subject it to personal jurisdiction (whether specific or general) in this judicial district.

Furthermore, Joy Carpets moves this Court, pursuant to Federal Rule of Civil Procedure 12(b)(3) to dismiss this case due to this forum being an improper venue under 28 U.S.C. § 1391(c) and 1400(a).

Joy Carpets files a supporting Memorandum of Law and the Declaration of Denis N. Dobosh concurrently with the filing of the instant Motions, and also relies on the pleadings and papers on file in this action.

Respectfully submitted,

CHAMBLISS, BAHNER & STOPHEL, P.C.

By: /s/ John G. Jackson

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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2012, the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/ John G. Jackson